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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 06 - 0090 - MHP
	)	
Plaintiff,	)	
	)	STIPULATION AND <del>[PROPOSED]</del>
v.	)	ORDER TO CONTINUE STATUS
	)	HEARING AND EXCLUDE TIME
HARUT KORAKOSSIAN, <i>et al.</i> ,	)	
	)	
Defendant.	)	

WHEREAS, defendants HARUT KORAKOSSIAN, WILSON FUNG, and EDWARD ALAN RIDGILL, are charged with violations of federal law in an indictment pending in the above-entitled matter before this Court and are currently scheduled for a status hearing date on Tuesday, September 5, 2006, at 10:00 a.m. before this Court;

WHEREAS, government has recently undergone a re-assignment of this matter within the United States Attorney's Office for this District, and as a result, Assistant United States Attorney Timothy J. Lucey is now the lead and responsible attorney for the government in this matter;

WHEREAS, AUSA Lucey was previously scheduled to be out of this District from September 1 through September 9, 2006, such that he is not available to attend the

1 hearing on September 5, 2006, and due to the recent assignment to the matter, would, in  
 2 any event, require additional time to review the case files and discovery in order to be  
 3 effectively prepared to address the Court on substantive and procedural issues relative to  
 4 discovery issues and trial setting;

5 WHEREAS, government counsel has conferred with counsel for all three  
 6 defendants, who have agreed to continue the hearing date until the next available date on  
 7 all counsels' calendars, which is Monday, October 16, 2006, and further agreed with the  
 8 government that time should be excluded under the Speedy Trial Act between August 31,  
 9 2006 and October 16, 2006, based on the need for continuity of counsel as well as  
 10 effective preparation of counsel, pursuant to 18 U.S.C. §§ 3161(h)(8)(A), (B);

11 WHEREAS, government counsel has conferred with the clerk for this Court, who  
 12 has determined that October 16, 2006 at 10:00 a.m. is an available date on this Court's  
 13 calendar;

14 THEREFORE, the parties hereby mutually and respectfully request and stipulate  
 15 that the matter be continued and time excluded under the Speedy Trial Act until Monday,  
 16 October 16, 2006, at 10:00 a.m. before this Court, in order to ensure effective preparation  
 17 of all counsel as well as the continuity of government counsel, and that the ends of justice  
 18 served by such a continuance outweighs the best interest of the defendants and the public  
 19 in a speedy trial, pursuant to 18 U.S.C. §§ 3161(h)(8)(A), (B).

20 **IT IS SO STIPULATED.**

21 \_\_\_\_\_  
 22 KEVIN V. RYAN  
 United States Attorney

23 Dated: August 30, 2006

\_\_\_\_\_  
 24 /S/ Timothy J. Lucey  
 TIMOTHY J. LUCEY  
 Assistant United States Attorney

25 MORRISON & FOERSTER

26  
 27 Dated: August 30, 2006

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 28 /S/ Eugene G. Illovsky  
 EUGENE G. ILLOVSKY  
 Attorney for Defendant  
 Harut Korakossian

BARRY PORTMAN  
Federal Public Defender

Dated: August 30, 2006

/S/ Geoffrey A. Hansen  
\_\_\_\_\_  
GEOFFREY A. HANSEN  
Attorney for Defendant  
Edward Alan Ridgill

ELLEN M. BARRY

Dated: August 30, 2006

/S/ Ellen M. Barry  
\_\_\_\_\_  
ELLEN M. BARRY  
Attorney for Defendant  
Wilson Fung

**IT IS SO ORDERED.**

Dated: 9/1/2006

